

**BEFORE AN INDEPENDENT HEARING COMMISSIONER**

In the matter of the Resource Management Act 1991

And

In the matter a resource consent application and an objection to a decision of the Gisborne District Council by Simon Cave concerning a revetment wall at the toe of the cliff below 4, 6 and 8 Tuahine Crescent, Wainui Beach

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**STATEMENT OF EVIDENCE OF REBECCA ANNA CRAY (LANDSCAPE, VISUAL, AND NATURAL CHARACTER EFFECTS) ON BEHALF OF THE APPLICANT**

Dated: 5 October 2022

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## INTRODUCTION

1. My name is **Rebecca Cray**.
2. I am a Senior Landscape Architect at Beca Limited and Registered Landscape Architect with the New Zealand Institute of Landscape Architects (**NZILA**). I have practiced landscape architecture for 10 years, based in Rotorua, Wellington, Vancouver and now Auckland.
3. My experience primarily consists of parks and subdivision development projects, and over the last four years I have focused on preparing landscape and visual assessments for a wide range of development projects located across the North Island.
4. The following project experience is particularly relevant to my evidence as it includes the assessment of landscape and visual effects within the coastal environment:
  - (a) **Te Uruhi (Kapiti Gateway) Visitor Centre and Biosecurity Facility, Kapiti Coast District Council, 2020 – 2022:** I prepared a landscape and visual assessment for a new building “Te Uruhi”, associated carparking, sculpture and public amenity improvements, and an additional Southern Carpark facility (500 metres away). The project is proposed for Maclean Park, in Paraparaumu, and is subject to Coastal Environment and Special Amenity Landscape overlays. The assessment included the preparation of visual simulations and full consideration of landscape, natural character, and visual effects. I recently prepared evidence and presented at the hearing (October 2022).
  - (b) **Kopu Marine Precinct, Thames Coromandel District Council, 2020 – 2021:** I prepared a landscape and visual assessment that accompanied the Fast Track Application for a new commercial wharf, haul-out facility, and carpark on the edge of the Waihou River, Thames. The assessment included the preparation of visual simulations, a Zone of Theoretical Visibility and full consideration of landscape, natural character, and visual effects.
  - (c) **Gisborne Port, Eastland Port, 2020 – 2021:** I undertook a landscape analysis and prepared preliminary landscape advice for the proposed twin berth extension of Eastland Port. The project included reclamation,

a new seawall and breakwater on the edge of Poverty Bay and the Turanganui River, Gisborne. The preparation of the preliminary study included a Zone of Theoretical Visibility and included impacts on the historical Cooks Landing Site, which doubled as a site of cultural significance for mana whenua.

- (d) **East Cape Road, Stage 2 Security Project, Gisborne District Council, 2020 – 2021:** I prepared a landscape and visual assessment for road stabilisation and widening works, including new sea wall rock revetments and coastal planting to secure the existing East Cape Road. The assessment included the preparation of visual simulations and a full consideration of landscape, natural character, and visual effects on a wide range of key landscape features (including the coastal environment) and viewing audiences. It included impacts on regionally significant coastal rock formations and the wider Outstanding Natural Landscape.

**Application involvement**

- 5. My involvement in the Application began in December 2018 when I undertook an initial site visit and subsequent preparation of the landscape and visual effects assessment (**LVA**) that accompanied the initial resource consent application to Gisborne District Council (Council).
- 6. Since the initial LVA a key design change was undertaken in early 2021, which resulted in the rock revetment footprint being extended further north, including angled tie-in and tapered northern slope (1:5).
- 7. I subsequently updated the LVA to reflect these changes (see version 3.0) and prepared a report to accompany an Existing Use Rights Application to Council.
- 8. I have undertaken two visits to the site and surrounding local landscape, including:
  - (a) On 3<sup>rd</sup> December 2018, I carried out an initial site visit to Wainui Beach, which included visiting the subject properties, the proposed site, and publicly accessible points predominantly to the north of the site along Wainui Beach. This analysis included identification of the Project visual catchment, potentially affected properties, and photography from key representative viewpoints.

- (b) On 13<sup>th</sup> April 2021 I revisited the site with Principal Coastal Scientist, Mr Morgan, to understand the proposed design changes as part of the preparation of the Existing Use Rights Application. At this point, the revetment design had been revised to extend further northwards along the coastal boundary and taper in on an approximately 70-degree angle towards the footings of the public beach access, which connects up to Tuahine Crescent. I again captured 50mm photography from comparable viewpoint locations.
9. In preparing my evidence I have reviewed:
- The submissions opposing the Project.
  - The s42a report (dated 30 June 2020)
  - The s42a Addendum (dated 27 September 2022); and
  - Specifically, the proposed conditions attached (page 34) of the s42a Addendum.
10. I do not rely on the evidence of other expert witnesses in forming my opinion, however I have previously reviewed the Coastal Processes Assessment provided by Principal Coastal Scientist, Mr Morgan.

### **Code of Conduct**

11. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2014. This assessment has been prepared in compliance with that Code, as if it were evidence being given in Environment Court proceedings. Unless I state otherwise, this assessment is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

### **Scope of evidence**

12. The primary focus of my evidence is to respond to landscape-related matters raised in submissions and any relevant commentary and recommendations provided in the section 42A report.
13. Outside of the summary provided below and where I reaffirm key findings, I do not repeat the content of the LVA. This is because the methodology,

relevant statutory context, and assessment of the landscape, visual and natural character effects of the proposal provided in the LVA all remain relevant.

## 1 LVA summary

14. The residents of 4,6 and 8 Tuahine Crescent are seeking Resource Consent or Existing Use Rights Consent for a replacement rock revetment within the coastal (eastern) boundary of their properties at Wainui Beach, Gisborne.
15. The proposed rock revetment will replace a previous rock revetment with iron bars retainers within the private property boundary of 4,6, and 8 Tuahine Crescent.
16. Under the Tairāwhiti Resource Management Plan the site is included within Section C3 of the Outstanding Landscape Area.
17. I note the discussion of the planners concerning the relevant provisions of the Regional Plan and the New Zealand Coastal Policy Statement.
18. The Outstanding Landscape features relevant to the LVA are: headland, bay, scarp and the sea. The policy provisions seek to protect these elements from *'inappropriate subdivision, use and development'* and provide for the restoration and enhancement of coastal vegetation and values.
19. Since preparing the LVA and subsequent Existing Use Rights Application no material changes have arisen with respect to the potential for landscape, visual and natural character effects on those features identified in the Tairāwhiti Resource Management Plan.
20. Visual effects for the replacement over the medium term (3-8 years) for public beach users from various viewpoints ranged from **very low** to **low**.
21. There was **no effect** found for private residents along Wainui Beach.
22. The effects ratings given were subject to the proposed coastal mitigation planting (specified on page 30 of my LVA, v3.0) being implemented, and the proposed conditions (23 and 24) for *"Finished Site works and Planting Plan."*

Clarifications

23. For differences in terminology regarding ‘repair’ or ‘replacement’ I refer to Ms McPherson’s evidence for clarification.

**2 RESPONSE TO SUBMISSIONS AND S42A REPORT**

24. Of the 87 submissions received, 84 were in support, one neutral, and three opposed the development<sup>1</sup>.

25. Submissions in opposition raised issues around end effects and seawall design, which is outside of my area of expertise, and I defer to the evidence of Mr Morgan.

26. Similarly, the s42a Report Addendum did not raise any issues relating to landscape, visual and natural character matters.

**3 CONCLUSION**

27. The visual effects for public beach users range from **very low** to **low** and are subject to the proposed conditions, including coastal native mitigation planting being undertaken.



**5 October 2022**

**Rebecca Cray**

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<sup>1</sup> The three submitters opposing: Nes Benacek, Laurie Lautmann and Robin Briant.  
One neutral: Katherine Cave